

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS
ANTITRUST

Case No. 3:10-md-2143 RS (JCS)

This Document Relates to:
ALL INDIRECT PURCHASER ACTIONS

**DECLARATION OF CHRIS WHIPPS
RE PROPOSED PLAN OF FINAL
FUNDS DISTRIBUTION TO
RESPECTIVE STATE ATTORNEYS
GENERAL OFFICES**

1 I, Chris Whipps, declare as follows:

2 1. I am employed as CEO of Sipree, Inc., d/b/a DigitalPay, which serves as one of the
3 Court-appointed administrators of the settlements in this action. As the CEO of DigitalPay, I oversee
4 the administrative services provided in this matter. I make this declaration to further outline those
5 administrative services. I have personal knowledge of the facts set forth herein and, if called as a
6 witness, could and would testify competently thereto.

7 2. As stated in the Distribution declaration submitted October 3, 2022, the second phase
8 of the settlement distribution to class members totaled \$33,462,993.86 and was initiated and
9 distributed via check, wire, and digital payments in October of 2022. The breakdown of payment
10 sent by check and wire payments vs. digital payments was:

11 *Checks/wires: \$27,925,599.69*

12 *Digital payments: \$5,537,022.99*

13 3. Digital payments for the second distribution totaling \$5,537,022.99 were completed
14 on November 4, 2022.

15 4. On January 5, 2023, which was the planned expiration date for all second phase
16 checks, \$824,512.59 of uncashed checks remained. Due to the significant dollar value of uncashed
17 checks, an additional program extension was filed on January 5, 2023, in order to provide non-
18 responsive claimants a final chance to redeem their payments. A custom communication was also
19 sent to these claimants on January 10, 2023, providing notice of the extension. As a result of the
20 extension, an incremental \$632,389.07 in checks was cashed and received by claimants. After
21 accounting for uncashed checks, final check payments and two as-yet unpaid administration
22 invoices, \$259,549.09 remains in the settlement account.

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REMAINING FUNDS IN QSF AS OF 3/3/2023		
	Qualified Settlement Fund Account Balance	\$ 480,469.88
OUTSTANDING PAYMENTS & UNDISTRIBUTED FUNDS		
	Epiq Administrative Fees (Not yet paid)	\$ (173,458.36)
	Epiq administrative change order fee due to late Objector (not yet paid)	\$ (38,000.00)
	Final 3 check payments	\$ (9,462.43)
Total Remainder for Final Distribution to AG Offices		\$ 259,549.09

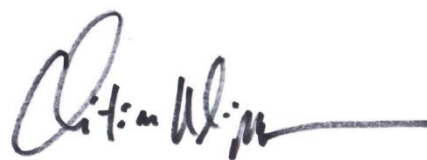
5. Per the original distribution plan, the remaining settlement funds are to be distributed to the respective state Attorneys General offices to which any payment check was originally mailed. Any remaining funds not associated with a check payment will be sent to the state of California Attorney General office. The following breakdown therefore represents payments to each state based on their population of the class as a whole. Epiq Class Action Claims and Solutions (Epiq) will manage the final distribution of these funds. These payments will be sent via check on or before April 3, 2023.

STATE	TOTAL
California	\$186,776.17
Florida	\$1,506.57
Virginia	\$3,543.79
Massachusetts	\$24,699.26
New York	\$16,800.82
Oregon	\$9,260.02
North Carolina	\$14.33
Minnesota	\$826.51
Arizona	\$168.44
Georgia	\$311.35
New Jersey	\$7.59
Puerto Rico	\$2,729.97
Wisconsin	\$8,353.24
Michigan	\$18.80
Maryland	\$73.24
Indiana	\$23.68
Missouri	\$8.45

STATE	TOTAL
Texas	\$4,769.26
Illinois	\$14.33
Rhode Island	\$1,130.65
Pennsylvania	\$1,100.19
Nevada	\$125.63
Mississippi	\$472.05

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of March 2023, in San Francisco, California.



CHRIS WHIPPS